

1 OLIVER J. PANCHERI, ESQ.  
2 Nevada Bar No. 7476  
3 SANTORO WHITMIRE  
4 10100 W. Charleston Blvd., Suite 250  
5 Las Vegas, Nevada 89135  
6 Tel.: (702) 948-8771 / Fax: (702) 948-8773  
7 Email: [opancheri@santoronevada.com](mailto:opancheri@santoronevada.com)

8 SIMON J. FRANKEL, ESQ.  
9 *(Pro Hac Vice forthcoming)*  
10 COVINGTON & BURLING LLP  
11 Salesforce Tower  
12 415 Mission Street, Suite 5400  
13 San Francisco, CA 94105-2533  
14 Tel.: (415) 591-7052  
15 Email: [sfrankel@cov.com](mailto:sfrankel@cov.com)

16 *Attorneys for Defendants Tripadvisor, LLC  
17 and Viator, Inc.*

18  
19 **UNITED STATES DISTRICT COURT  
20 DISTRICT OF NEVADA**

21 SAN FRANCISCO COMPREHENSIVE  
22 TOURS, LLC, a California limited liability  
23 company,

24 Plaintiffs,

25 v.

26 TRIPADVISOR, LLC, a Delaware limited  
27 liability company; VIATOR, INC., a Delaware  
corporation,

Defendants.

Case No. 2:20-cv-02117-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANTS TO  
FILE A RESPONSE TO THE  
COMPLAINT AND TO EXTEND  
BRIEFING SCHEDULE REGARDING  
DEFENDANTS' POTENTIAL MOTION  
TO DISMISS**

**(FIRST REQUEST)**

28 IT IS HEREBY STIPULATED AND AGREED between Plaintiff SAN FRANCISCO  
29 COMPREHENSIVE TOURS, LLC ("Plaintiff") and Defendants TRIPADVISOR, LLC and  
30 VIATOR, INC. (together, "Defendants"), by and through their respective counsel and pending  
31 the Court's approval, that Defendants shall have an additional thirty (30) days to respond to the  
32 Complaint [ECF No. 1]. Defendants' deadline to respond to the Complaint is extended to  
33 **January 27, 2021.**

1 IT IS FURTHER STIPULATED AND AGREED between Plaintiff and Defendants that,  
2 should Defendants file a motion to dismiss the Complaint, the briefing schedule for the motion to  
3 dismiss shall be extended and modified as follows: Plaintiff shall have an additional thirty (30)  
4 days to oppose any motion to dismiss, which will be **March 12, 2021**. Defendant will have an  
5 additional seven (7) days to file a reply, which would be due on **March 26, 2021**.

6 Good cause exists for the extensions set forth herein. Defendants' counsel was only  
7 recently retained in this matter and the response to the Complaint currently falls during the  
8 Holiday Season. Further, the parties and their counsel are dealing with difficulties arising from  
9 working remotely due to COVID-19 restrictions and precautions. Finally, the proposed briefing  
10 schedule also addresses the conflicts with the schedules of counsel and the potential complexities  
11 of this matter. This is the first extension requested and the parties do not anticipate requesting  
12 another extension for Defendants to respond to the Complaint or for the briefing schedule in  
13 connection with any motion to dismiss to be further modified.

14 Dated this 23rd day of December, 2020.

Dated this 22nd day of December, 2020.

15 /s/ Oliver J. Pancheri

16 Oliver J. Pancheri (NV Bar No.7476)  
17 **SANTORO WHITMIRE**  
18 10100 W. Charleston Blvd., Suite 250  
19 Las Vegas, Nevada 89135  
20 Tel.: (702) 948-8771 / Fax: (702) 948-8773  
21 Email: opancheri@santoronevada.com

22 Simon J. Frankel (*Pro Hac Vice forthcoming*)  
23 **COVINGTON & BURLING LLP**  
24 415 Mission Street, Suite 5400  
25 San Francisco, CA 94105-2533  
26 Tel.: (415)591-7052  
27 Email: sfrankel@cov.com

28 *Attorneys for Defendants*

/s/ Thomas A. Larmore

29 Steven A. Gibson (NV Bar No.6656)  
30 Jodi Donetta Lowry (NV Bar No.7798)  
31 Thomas A. Larmore (NV Bar No. 7415)  
32 **GIBSON LEXBURY LLP**  
33 3470 E. Russell Rd., Second Floor  
34 Las Vegas, Nevada 89120  
35 Tel.: (702) 541-7888 / Fax: (702) 541-7899  
36 Email: sgibson@gibsonlexbury.com  
37 jlowry@gibsonlexbury.com  
38 tlarmore@gibsonlexbury.com

39 *Attorneys for Plaintiff*

40 **IT IS SO ORDERED:**

41   
42 UNITED STATES MAGISTRATE JUDGE

43 Dated: December 29, 2020